



Agenda Item 5

CX/CF 12/6/8-Add.2  
March 2012

ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Sixth Session

Maastricht, The Netherlands, 26 – 30 March 2012

#### PROPOSED DRAFT MAXIMUM LEVELS FOR ARSENIC IN RICE

*Comments at Step 3 submitted by Ghana and Food and Drink Europe*

#### GHANA

##### SPECIFIC COMMENTS

Ghana supports the setting of an ML of 0.3mg/kg for inorganic or total arsenic in raw rice. We further support the development of a validated method for inorganic arsenic in rice as this is the form of most concern to human health.

##### Rationale

Rice widely consumed in Ghana and most of it is imported, therefore the setting of MLs is of importance.

#### FOOD AND DRINK EUROPE

Food Drink Europe congratulates the authors of the working document for having drafted a very comprehensive paper and recognises the important recommendations outlined in the draft paper (CX/CF 12/6/8). However, we are concerned about the ambiguity of the recommendations outlined in the paper as currently drafted.

In particular, the recommendations propose two maximum levels, namely 0.3mg/kg "whether for inorganic As or total As" or "0.2 mg/kg only for inorganic As in polished rice". Moreover, the recommendations suggest that total As be measured first, and then inorganic As.

As currently drafted, these standards could create confusion among operators as to what is and is not compliant. If a consignment of rice is tested and found to exceed 0.3mg/kg total As, but when tested further found to be within the 0.2 mg/kg limit, what would be the legal status of this consignment?

We suggest that the maximum levels should primarily focus on the principal risk to consumers, namely inorganic As. Furthermore, the proportion of inorganic and total arsenic in rice is not constant and, as outlined in the draft paper, can vary from 10% to 93%. In order to set a health-based ML, it is therefore necessary to focus on the inorganic form of arsenic only.

Analytical methods for inorganic arsenic are still under development and we note that there are no officially validated methods for inorganic arsenic. FoodDrinkEurope supports the recommendation of the Codex working group to ask CCMA to firstly develop and validate an analytical method for inorganic arsenic in rice.

Given the arguments above, FoodDrinkEurope is of the opinion that it is currently premature to set an ML for (inorganic) arsenic in rice. Instead, we would propose and support the recommendation of the eWG to develop a Code of Practice which could address factors which influence inorganic As levels in rice and rice products such as the content of soil and water, processing and cooking procedures. In parallel, work can continue on analytical methods, occurrence data and risk assessment.